

EXHIBIT C

From: Buie, Alan (USATXW) <Alan.Buie@usdoj.gov>

Sent: Monday, January 29, 2024 3:51 PM

To: egm@egmlaw.com

Cc: Latcovich, Simon <SLatcovich@wc.com>; Looby, Patrick <PLooby@wc.com>

Subject: Production 5 in A-23-CR-100-DAE

Gerry, your USB drive, containing the discovery described in the attached letter, is ready for pickup at our front desk. Or I can drop it at your office in the morning if you prefer.

If you want to leave the drive with us for a day or two, to see whether we can add the bank records before you pick it up, feel free. But I'm far from certain that all of the bank records will fit on that size drive.

Thanks

Alan M. Buie
512.417.2901



United States Department of Justice

United States Attorney's Office

Western District of Texas

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January 29, 2024

Gerry Morris, Esquire
The Law Office of E.G. Morris
505 West 12th Street, Suite 206
Austin, Texas 78701

Re: Discovery Production 5 in *United States v. Natin Paul*, No. A-23-CR-100-DAE

Dear Mr. Morris:

Our staff have loaded onto your device the following additional discovery:

1. *FBI email messages dated 2014 through June 8, 2023.* I reviewed a large collection of email messages from FBI, and I have attempted to provide you with copies of any messages that contain commentary on the facts or evidence. Text redacted from the messages is chiefly (a) related only to the Public Integrity Section investigation; or (b) work product of the government's attorneys.
2. *Files from the Texas State Securities Board ("TSSB").* One of our investigators was employed by TSSB and had a small file at his TSSB office, separate from the FBI file.
3. *Investor questionnaire responses.* In 2020, FBI sent a questionnaire to a list of known World Class investors, and a folder is included here for each one that responded. Some did not complete the questionnaire and only sent records or email messages.
4. *AUSA interview binders (two folders).* One folder contains documents that I collected for interviews related to World Class Holding Company, LLC's Series A Preferred offering, which is not the subject of any of the pending charges. The other folder contains documents I collected that are pertinent to limited partnership investments.
5. *Grand Jury presentations (two folders).* These folders include transcripts, exhibits, and slide decks from the presentation of the indictment and the superseding indictment.
6. *Arrest audio and video.* The FBI Special Agents who arrested the defendant on June 8, 2023 wore audio and/or video recording equipment.
7. *Harwood interview.* This is the most recent interview of accountant Elizabeth Harwood.
8. *FBI EC and Interview Notes.* This folder collects agent interview notes that may not have been included in earlier discovery.

Gerry Morris, Esquire
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9. *Materials from FBI Forensic Accountants (two folders)*. The Access database of bank records is in the Susan Ball folder.

If you have any questions, please call me at 512.417.2901. If you or your co-counsel would like a more thorough description of the materials listed above, I suggest we schedule a time to look at the material together and discuss it, either in person or via WebEx.

Sincerely,



Alan M. Buie
Assistant United States Attorney

cc: Simon Latcovich, Esquire (slatcovich@wc.com)
Patrick Looby, Esquire (plooby@wc.com)